

1 THOMAS F. LANDERS [SBN 207335]  
[tlanders@swsslaw.com](mailto:tlanders@swsslaw.com)  
2 ADAM R. SCOTT [SBN 333706]  
[ascott@swsslaw.com](mailto:ascott@swsslaw.com)  
3 SOLOMON WARD SEIDENWURM & SMITH, LLP  
4 401 B Street, Suite 1200  
San Diego, California 92101  
(t) 619.231.0303  
5 (f) 619.231.4755  
6 Attorneys for Defendant,  
OCMBC, INC. dba  
7 LOANSTREAM MORTGAGE

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**  
11

12 KIMBERLY HUDSON-BRYANT,  
individually and on behalf of all others  
13 similarly situated,

14 Plaintiffs,

15 v.

16  
17 OCMBC, INC. dba LOANSTREAM,  
PREMIER FINANCIAL MARKETING  
18 LLC D/B/A RESMO LENDING, AND  
SEAN ROBERTS

19  
20 Defendants.  
21  
22  
23  
24  
25  
26  
27  
28

Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF THOMAS F.  
LANDERS IN SUPPORT OF JOINT  
MOTION AND STIPULATION TO  
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

1 I, Thomas F. Landers, declare:

2 1. I am an attorney at law licensed to practice before all federal and state  
3 courts in the State of California and am a partner with Solomon Ward Seidenwurm &  
4 Smith, LLP (“SWSS”), counsel for Defendant OCMBC, INC. dba LOANSTREAM  
5 MORTGAGE (“LoanStream”) in this action. I have personal knowledge of the facts  
6 set forth in this declaration and I submit this declaration in support of the Parties’ Joint  
7 Motion and Stipulation to Continue Case Deadlines (“Stipulation”).

8 2. Plaintiff filed a class action complaint on or about January 1, 2024.

9 3. After conducting certain discovery, on September 10, 2024, Plaintiff  
10 filed a first amended complaint (“FAC”) and named two additional defendants. (ECF  
11 No. 37).

12 4. On October 24, 2024, the Court issued a revised scheduling order  
13 (“Scheduling Order”). (ECF No. 48).

14 5. On April 28, 2025, the Court issued its Order re Joint Motion and  
15 Stipulation to Continue Case Deadlines (“Revised Scheduling Order”) (ECF No. 50).

16 6. On June 25, 2025, the Court issued its modified Order Re Joint Motion  
17 and Stipulation to Continue Case Deadlines (ECF No. 52). The primary reason for  
18 that continuance was because a key witness had been involved in a traffic accident  
19 that resulted in her unavailability.

20 7. On September 25, 2025 the Court issued another modified Order Re  
21 Joint Motion and Stipulation to Continue Case Deadlines, which further continued the  
22 trial date and related ligation deadlines (ECF No. 55). The reason for this continuance  
23 was the key witness’ ongoing unavailability, plus the Plaintiff became unavailable  
24 due to the hospitalization of her husband and her status as his primary caregiver.

25 8. The Court issued the above orders due to witness and party health  
26 related scheduling issues that prevented the scheduling of certain depositions,  
27 including Plaintiff and LoanStream’s Rule 30(b)(6) witness. Those issues still exist.  
28 LoanStream’s 30(b)(6) designee remains unavailable. As further described in the

1 accompanying declaration of Andrew R. Perrong, Plaintiff has been unavailable to  
2 participate in the case.

3 9. The Parties have meet and conferred in good faith and have agreed to the  
4 following deposition schedule:

- 5 • deposition of Plaintiff on February 17, 2026; and
- 6 • deposition of LoanStream 30(b)(6) designee on February 24,  
7 2026

8 10. For the reasons set forth herein, and to conserve time and judicial  
9 resources, the Parties believe that a 60-day extension of all deadlines will allow the  
10 Parties to properly complete discovery and prepare for trial.

11 I declare under penalty of perjury under the laws of the State of California that  
12 the foregoing is true and correct, and that this declaration was executed on January 6,  
13 2026, at San Diego, California.

14 /s/ Thomas F. Landers

15 Thomas F. Landers, Esq.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28